



P.O. Box 66, Big Bend National Park, TX 79834
June 16, 2026

U.S. Customs and Border Protection (CBP)
U.S. Border Patrol Headquarters
Program Management Office Directorate 1300 Pennsylvania Ave. 6.5E Mail Stop 1039
Washington, DC 20229-1100
ATTN: Michelle Barnes

Submitted via email to : BigBendComments@cbp.dhs.gov
Subject: Brewster County Vehicle Barrier System Construction

Dear Ms. Barnes:

[Keep Big Bend Wild](#) submits these comments in hopes that that CBP will seriously consider all public comment before proceeding with plans to build border security infrastructure within Big Bend National Park (BBNP). We respectfully point out that you can enhance border security in BBNP without destroying what makes it one of America's most treasured landscapes. But it will take a commitment on your part, and enforced restraint on the part of your contractors, to avoid wholesale and unaccountable destruction of the park's natural, cultural, and scenic resources.

A secure border and conserving America's natural and cultural resources do not have to be in conflict.

Urgency: Notwithstanding the waiver issued by the Secretary of Homeland Security on June 9, 2026, the 118 miles of border within the national park are not an area of high illegal entry. [Data](#) shared by the Border Patrol with the National Park Service show that apprehensions within the park since 2023 have amounted to less than 0.05% of all the illegal migrant apprehensions on the southern border. [CBP data](#) show that the Big Bend Sector as a whole has by far the lowest number of apprehensions of the nine sectors on the Mexican border.

→ There is no border security emergency here. While we regret the issuance of a waiver of federal, state, and other laws that constitute "normal" process, we urge CBP to slow down, analyze the comments you will receive, publish them, transparently show how you are responding and modifying your plans in response to those comments, and republish your final plans before any groundbreaking action is taken in the national park.

Rectifying Inconsistencies: In [letters](#) to 19 Congressional representatives written May 21, 2026 representing the Department, Mr. Scott wrote that “the Big Bend area contains some of the most unique and important scenery and archeological landscapes in Texas, and it is valued accordingly. Big Bend National Park and its related areas also provide support for the local and regional economy. DHS recognizes this along with the intrinsic importance these areas hold for Texans and others who visit and enjoy them. Border security measures in the Big Bend National Park or the Big Bend Ranch State Park will be adapted to the terrain; and they will use technology, such as cameras and sensors, along with a limited number of low-profile vehicle barriers and patrol roads strategically placed to leverage the landscape that serves as a natural deterrent. Additionally, lighting will not be installed due to environmental considerations and operational requirements.”

He further wrote that “CBP’s goal is to balance operational needs with responsible stewardship of the land and minimize harm to the greatest extent practicable in accordance with applicable law while still meeting CBP’s operational requirements.”

Yet the [waiver](#) the Secretary issued on June 9 allows for “the construction of physical barriers and roads (including, but not limited to, accessing the project areas, creating and using staging areas, the conduct of earthwork, excavation, fill, and site preparation, and installation and upkeep of physical barriers, roads, supporting elements, drainage, erosion controls, safety features, lighting, cameras, and sensors) in the project area.”

Furthermore, DHS’ [description](#) of the project includes 205 miles of new roads up to 24 feet wide, staging areas and laydown yards, lighted utility poles near the Port of Entry (which sees absolutely no illegal entries), buried power and fiber optic cables, 30- x 30’ utility shelters, and unspecified water use in an environment where water is scarce and endangered species rely on groundwater springs.

- We urge you to honor Commissioner Scott’s commitments and do everything possible to minimize unnecessary impacts to Big Bend National Park, and delete all plans that are in any way inconsistent with his commitments.

Accordingly, we recommend the following specific changes to the plans:

Vehicle Barriers: CBP proposes 17 miles of metal vehicle barriers, in 4 locations. There is no history, nor risk, of vehicles crossing the Rio Grande at the two middle locations.

- We urge you to strike the middle two vehicle barriers from your plans.

While our collective experience indicates that the risk at the two other locations is extremely low, any vehicles that did successfully cross the Rio at these locations would immediately head for the nearest paved roads, which are located just a few miles away outside park boundaries.

- Restrict any vehicle barriers near Lajitas and downstream of Boquillas Canyon to lands outside the park, and they will accomplish the same purpose without impacting NPS lands and resources.
- We also ask for assurances that non-vehicular access to public lands in the national park not be restricted by any vehicular barriers.

Additional Patrol Roads: There are already paved and unpaved roads that roughly parallel most of the border in the national park, regularly utilized by US Border Patrol (USBP) agents for their patrols. While the 51-mile unpaved River Road is not as close to the Rio Grande as the proposed new road, it is where migrants that do manage to cross the Rio Grande in the park are most frequently apprehended. There is no security benefit to apprehending them a bit closer to the river.

Constructing a new parallel road would cause huge devastation to a vast unroaded section of the national park, in some cases requiring blasting of mountains. It would also unnecessarily violate, in some areas, a wilderness recommendations supported by the NPS under all administrations since first [proposed by Richard Nixon](#) in 1973. In some areas, it would adversely impact existing NPS administrative and visitor facilities which are key to the purpose of the national park as established by Congress. It would hardly “leverage the landscape that serves as a natural deterrent,” as Commissioner Scott committed.

The land area south of River Road is remote, and lightly used by the public. If a new road were built south of River Road, or north of Mesa de Anguila, and it were open to the public, it would create a major change in the use of the park and require significantly more patrol resources than the NPS is likely to have available.

- Upgrade the River Road if it is necessary, rather than build a new parallel road, no higher than the standard long ago agreed-to by the NPS and USBP.
- Do not pave any existing or new roads in the park.
- Delete the section of new road north of Mesa de Anguila.
- Do not attempt to build a road across Mariscal Mountain or Ernst Ridge, or any other place in the park that would require blasting or construction of switchbacks.
- Do not place your road(s) within any existing NPS visitor or administrative facilities, including Santa Elena Canyon parking area and trail access; Castolon Historic District; Hot Springs Historic District; Rio Grande Village development (including Daniels Ranch, the RV park, the campground, or the NPS housing/administrative area); and the Boquillas Canyon parking lot or trail access.
- If you must build any new roads for USBP patrol purposes, gate them so they are not available for public vehicular use.

Sensors and Communication and Power Cables: There are currently hundreds of electronic surveillance devices in the national park and surrounding areas, maintained jointly by USBP, NPS,

and county sheriffs. These are all battery or solar powered, communicate wirelessly, and in almost all cases visually and environmentally unobtrusive. The local power grid is notoriously unreliable, with blackouts often lasting for days. Many of the areas proposed for underground cables are in unstable environments subject to severe flash flooding; others, in rocky terrain, would require blasting to construct. Fiber optic cables will quickly be technologically obsolete.

Wireless surveillance sensors powered by battery or small solar panels would be far less intrusive, quicker to deploy and more nimble to move to other areas if the needs change, less environmentally destructive, less subject to power failure, and a vast saving of taxpayer funds. We are also concerned that in the absence of any meaningful and enforceable oversight by the NPS, commitments by DHS or its contractors to limit impact to narrow corridors adjacent to roads give us no confidence that the impacts would be minimal.

We understand that advanced aerial surveillance systems, including high altitude drones, have been successfully used for detection purposes in other areas of the border with great success, and as you know, these have been [recommended by the local sheriffs](#) who know the border and security issues in this area as well as anyone.

- We urge you to reconsider the sensor configuration and improve or enhance the existing sensor network with updated technology and improved wireless communications.
- In lieu of fixed, hardwired sensors, deploy advanced aerial surveillance systems, including high altitude drones that cannot be detected by casual observers on the ground.

Laydown and Staging Areas, Construction Camps, and Water Use: Big Bend National Park is the most sensitive environment on the entire US-Mexican border. Clearing of large areas to facilitate construction, in the absence of oversight or accountability by the NPS, will unnecessarily damage park resources and cause permanent visual scars. There is not enough water or wastewater capacity in the park's utility systems to accommodate large number of workers, and with DHS waiving the NPS Organic Act and General Authorities Act, it's unclear if NPS would even be able to enforce unrelated park rules if needed to restrain the conduct of workers even when they are not on the job. If you reduce the scope of the project as we have suggested, the number of workers and the footprint to support them will also be reduced.

New wells would further deplete precious groundwater resources needed both for park residents and visitors, as well as wildlife, including endangered animals. While you have waived the Endangered Species Act, you don't have to violate its intent with impunity. We have concerns about the impact of large water withdrawals from wells in the Terlingua area as well, as water supply is precarious there as well and large withdrawals have the potential for adversely affecting existing domestic water supplies.

- We urge you to keep any laydown or staging areas to existing paved sites in the park or, preferably, to use areas outside park boundaries.
- DO NOT build a construction camp or house workers anywhere inside Big Bend National Park.

- Truck in all water needed for construction activities from water-abundant areas outside of Brewster County rather than overtax the park and county's existing wells and delivery systems.

Lighting: Your published [plans](#) indicate that utility poles near the Boquillas Port of Entry will be lit, and shielding may be installed to reduce light spillage. That contradicts Commissioner Scott's commitment that there will be no lighting.

- We urge you to do as Mr. Scott said you would. No lights on any new CBP infrastructure in the national park.

As we have said, there does not need to be a conflict between a strong border, a thriving local economy, and conservation of the wildest, most intact landscapes of Texas and our nation. If Customs and Border Protection would meaningfully engage the public, local elected officials, sheriffs, and the National Park Service in a sincere effort to improve border security and to—as Commissioner Scott said, representing you-- minimize harm to the greatest extent practicable, we are absolutely confident that there are solutions that would satisfy your operational needs and not unduly harm one of the nation's most iconic national parks. It would also have the potential to rebuild trust with the people of Texas, which has been severely damaged by your Department's unilateral actions to date.

Thank you for considering our comments.

Sincerely,

/s/

Bob Krumenaker, Chair
Keep Big Bend Wild